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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

Chapter 11

**CHAPTER 11 TRUSTEE'S MOTION
FOR ORDER APPROVING
SETTLEMENT WITH PORT**

Mark D. Waldron, in his official capacity as the Chapter 11 Trustee (the
“**Trustee**”), hereby moves (the “**Motion**”) the Court pursuant to 11 U.S.C. § 363,
Fed. R Bankr. Proc. 9019 and LBR 9019-1 for an Order, as proposed in **Exhibit A**
attached hereto, approving that certain *Settlement Agreement and Release* (the
“**Agreement**”), attached hereto as **Exhibit B**, that the Trustee has entered into
with the Chelan Douglas Regional Port Authority, formerly the Port of Douglas
County (the “**Port**”).

This Motion is supported by the *Memorandum of Points and Authorities in
Support of the Chapter 11 Trustee's Motion for Order Approving Settlement With
Port* (“**Memorandum**”) and the *Declaration of Mark D. Waldron in Support of*

1 *the Chapter 11 Trustee's Motion for Order Approving Settlement With Port*, filed
2 herewith.

3 As set forth in the Memorandum filed herewith, the Agreement provides
4 that the parties will grant each other a general release of all claims and the estate
5 will pay to the Port \$22,500. The Agreement becomes effective on the date that
6 the Court enters an Order approving the Agreement. All obligations are
7 conditioned on approval of the Court.

8 WHEREFORE, the Trustee respectfully requests entry of an Order:

- 9 1. Granting the Motion;
10 2. Approving the Agreement;
11 3. Authorizing the Trustee to enter into and perform pursuant to the
12 terms of the Agreement; and,
13 4. Granting such other and further relief as the Court deems necessary
14 and just.

15 Dated: May 5, 2020

POTOMAC LAW GROUP PLLC

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17 By: /s/ Pamela M. Egan
Pamela M. Egan (WSBA No. 54736)
18 *Attorneys for Mark D. Waldron, Chapter 11*
19 *Trustee*
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